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Attorneys for Plaintiff/Counter Defendant
TESLA, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TESLA, INC.,
v.
MARTIN TRIPP,
Plaintiff,
Defendant.

Case No. 3:18-cv-00296-MMD-CLB

**NOTICE REGARDING THE
EXECUTION OF SETTLEMENT
TERMS**

AND RELATED COUNTERCLAIMS

Tesla, Inc., hereby submits this Notice providing instructions regarding the execution of the terms of the confidential Settlement Agreement, entered between the parties on November 30, 2020.

1. Payment. All amounts due and owing to Tesla can be paid via check made out to Tesla, Inc. and addressed to Tesla, Inc., c/o Austin Marsh, 901 Page Ave., Fremont, CA 94538. If Mr. Tripp prefers to make payment electronically via bank transfer, he can inform Tesla 30 (thirty) days in advance of such payment, and Tesla will provide confidential routing information at such time. All communications regarding payment should be made to Tesla counsel Alex Spiro, unless Mr. Tripp is informed otherwise.

2. Destruction of Confidential Materials. Section 16 of the Protective Order requires that the parties return or destroy all “Discovery Materials” within 90 days of the final disposition of the case. Accordingly, Mr. Tripp shall have until no later than March 1, 2021 to certify and file with the Court his compliance with the Protective Order. For the avoidance of doubt, the Protective Order defines “Discovery Materials” as “all items or information, including from any non-party, regardless of the medium or manner generated, stored, or maintained (including, among other things, testimony, transcripts, or tangible things) that are produced, disclosed, or generated in connection with discovery or Rule 26(a) disclosures in this case.” A sample certification of compliance is attached hereto as Exhibit A.

DATED this 1st day of December, 2020.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Alex Spiro
Alex Spiro
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*Attorneys for Plaintiff/Counter-Defendant
TESLA, INC.*

EXHIBIT A

I, Martin Tripp, certify as follows:

1. I have destroyed all physical copies of the Discovery Materials, including Tesla's Confidential and Attorneys' Eyes Only information, in my possession;
2. I have or caused to be deleted all electronic copies of the Discovery Materials, including Tesla's Confidential and Attorneys' Eyes Only information, on any and all electronic devices I own, whether or not such devices are currently in my physical possession, including any back-up of such devices such as on Cloud storage;
3. I have or caused to be deleted all electronic copies of the Discovery Materials, including Tesla's Confidential and Attorneys' Eyes Only information, that are within my control, from the internet, including from my email, and all user accounts I have access to on Google Drive, Microsoft OneDrive, Dropbox, www.Mega.nz, or any other electronic or online file storage or file sharing platform; and
4. I have deleted all links or descriptions that I personally posted or referenced to the Discovery Materials, including Tesla's Confidential and Attorneys' Eyes Only information, from social media, including, without limitation, Twitter, Facebook, Reddit, YouTube, SnapChat, LinkedIn, Instagram, TikTok, Quora, etc.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this document was executed in

_____, on _____, 2021.

Martin Tripp